

Exhibit A

AFFIDAVIT

I, Christopher Townsend, being duly sworn, states as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), United States Department of Justice, and have been so employed for approximately six years.

2. This affidavit is submitted in support of the forfeiture of the following property (“the defendant property”):

- a. One (1) 2016 Rolls Royce Wraith, VIN SCA665C5XGUX86171, with All Appurtenances and Attachments Thereon; and,*
- b. One (1) 2017 Chevrolet Corvette, VIN 1G1YU2D62H5604383, with All Appurtenances and Attachments Thereon.*

3. The information in this affidavit comes from my own investigation, as well as information provided by other law enforcement personnel with firsthand knowledge of the facts set forth herein. Because this affidavit is submitted for the limited purpose of supporting a Verified Complaint of Forfeiture, I have not included each and every fact known to the government about the investigation described below.

4. In October 2020, the Federal Bureau of Investigation (FBI) began investigating activities involving Nakita Cannady and her business entity, What About Us in Home Health Care Inc., which provided caretakers for various clients.

5. Between May 2017, through at least August 2018, Cannady filed fraudulent claims with Cigna Insurance.

6. On or about May 5, 2020, FBI investigators also determined that an application which contained fraudulent information was submitted to the U.S. Small Business Administration (SBA) requesting an Economic Injury Disaster Loan (EIDL) on behalf of What About Us Transport Service Corp.

7. On June 17, 2020, the loan was approved and \$9,000.00 was deposited into a Kimberly Clark Credit Union account #xxx0810 issued to Carl and Nakita Cannady. The balance on that account prior to the deposit was \$197.80. On June 23, 2020, additional EIDL loan proceeds totaling \$22,500.00 were deposited into the same account.

Seizure of One 2016 Rolls Royce Wraith

8. On August 12, 2020, Carl and Nakita Cannady purchased a 2016 Rolls Royce Wraith for \$193,399.00 including taxes and fees. To facilitate the purchase, Carl and Nakita Cannady obtained a loan from the Kimberly Clark Credit Union for \$198,500.00 secured by the 2016 Rolls Royce.

9. A review of the Kimberly Clark Credit Union records shows that between September 24, 2020, and December 31, 2020, fourteen payments totaling \$10,704.43 were withdrawn from account #xxx0810 and applied to the loan for the 2016 Rolls Royce. These payments were primarily derived from the fraudulent EIDL loan proceeds which were previously deposited to the account on June 17, 2020, and June 23, 2020.

Seizure of One 2017 Chevrolet Corvette

10. On June 13, 2018, Carl and Nakita Cannady purchased a 2017 Chevrolet Corvette for \$81,678.09 including taxes and fees. To facilitate the purchase, Carl and Nakita Cannady obtained a loan from the Kimberly Clark Credit Union for \$77,102.08 secured by the 2017 Chevrolet Corvette.

11. A review of the Kimberly Clark Credit Union records shows that between June 25, 2020, and January 14, 2021, thirty payments totaling \$7,170.00 were withdrawn from account #xxx0810 and applied to loan for the 2017 Chevrolet Corvette. These payments were primarily derived from the fraudulent EIDL loan proceeds which were previously deposited to the account on June 17,

2020, and June 23, 2020.

12. The FBI also determined that Nakita Cannady had obtained additional fraudulent stimulus loans for other business entities under her control.

13. On August 16, 2022, Nakita Cannady was indicted by a federal grand jury for various charges related to her fraudulent EIDL stimulus loan activities.

14. On August 18, 2022, a seizure warrant was obtained for both vehicles, the 2016 Rolls Royce Wraith and the 2017 Chevrolet Corvette.

15. On August 19, 2022, FBI investigators executed the warrant, and the vehicles were seized.

16. Based on the foregoing, the defendant vehicles are subject to forfeiture pursuant to 21 U.S.C. §881.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of February, 2023.

/s Christopher Townsend
CHRISTOPHER TOWNSEND,
Special Agent
Federal Bureau of Investigation